

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RENEE ZINSKY,)	Civil Action No.: 2:22-CV-547
)	
Plaintiff,)	
)	The Honorable Marilyn J. Horan
v.)	
)	
MICHAEL RUSSIN, RUSSIN)	
FINANCIAL, RUSSIN GROUP,)	
SIMON ARIAS, III, ARIAS AGENCIES,)	
S.A. ARIAS HOLDINGS, LLC,)	Electronically Filed
AMERICAN INCOME LIFE)	
INSURANCE COMPANY,)	
)	
Defendants.		

DEFENDANT MICHAEL RUSSIN'S MOTION FOR EXTENSION OF TIME TO
FILE A RESPONSE TO PLAINTIFF'S AMENDED MOTION
TO EXTEND DISCOVERY DEADLINE

Pursuant to the Standing Order and Procedures on Civil Practice, ECF No. 3, Defendant Michael Russin ("Defendant Russin"), respectfully moves this Court for an extension of time to file a Response to Plaintiff's Amended Motion to Extend the Discovery Deadline. In support of this Motion, Defendant Russin states the following:

1. On February 21, 2023, Plaintiff filed a Motion for Extension of Time to Complete Discovery to depose a "key witness" Natalie D'Achilles. ECF No. 53.
2. The following day, this Court entered an Order that any response to Plaintiff's Motion to Extend Discovery shall be filed on or before March 1, 2023. ECF No. 54.
3. On February 26, 2023, Plaintiff filed an Amended Motion for Extension of Time to Complete Discovery. In her Amended Motion, Plaintiff requests additional time to complete discovery because of an article related to this case published by an internet news publication, *Insider*. ECF No. 55.

4. Defendant's counsel contacted Plaintiff's counsel to determine whether she would consent to this motion for extension of time to respond. Plaintiff's counsel has not responded.

5. Given that Plaintiff filed her Amended Motion two business days before Defendant's Response is due, Defendant Russin respectfully requests that it be given until March 6, 2023, to file its Response to Plaintiff's Amended Motion to Extend Discovery Deadlines.

WHEREFORE, Defendant, Michael Russin, respectfully requests that this Honorable Court enter the Order attached hereto.

Dates: February 28, 2023

Respectfully submitted,

Cozza Law Group PLLC

s/Benjamin D. Webb
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Counsel for Defendant Russin

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing Motion for an Extension of Time to File Response to Plaintiff's Amended Motion to Extend Discovery Deadlines has been sent via the CM/ECF system to all counsel and/or parties of record.

Cozza Law Group PLLC

/s/Benjamin D. Webb
Benjamin D. Webb, Esquire